## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)		
Plaintiff,	)		
vs.	)	CRIMINAL NO.	17-30171-DRH
RAMIRO CISNEROS,	)		
Defendant.	)		

## **STIPULATION OF FACTS**

The parties hereby stipulate that, if this case had proceeded to trial, the Government would have proven the following beyond a reasonable doubt:

- 1. On October 4, 2017, Defendant Ramiro Cisneros was an inmate at the Federal Correctional Institution at Greenville, Illinois, in Bond County, within the Southern District of Illinois.
- 2. On the above date, the defendant, who was located in a sallyport, refused a direct order by Lieutenant K.D. to return to his housing unit. As Lieutenant K.D. was giving this order, Correctional Counsel J.F. entered the area where the defendant and K.D. were located. After J.F.'s arrival, the Lieutenant again gave the defendant a direct order to return to his housing unit. The defendant replied "no," and shoved Correctional Counselor J.F. in the chest with both hands. The defendant used physical force when doing so. Correctional Officers were able to gain control of the defendant and restrain him.
- 3. Correctional Counselor J.F. was performing an official duty at the time of the incident in that he was assisting another correctional officer, Lieutenant K.D., in an effort to get

an inmate to return to his housing unit which is where the inmate was supposed to be. By shoving

Correctional Counselor J.F. in the chest with both hands and replying "no" when directed to return

to his housing unit, the defendant was forcibly assaulting, resisting, opposing, impeding,

intimidating, and interfering with Correctional Counselor J.F. while J.F. was performing his

official duties.

4. This stipulation of facts is intended only to provide the Court with a sufficient

foundation to accept the defendant's guilty plea and is not necessarily an exhaustive account of the

defendant's criminal activity.

**SO STIPULATED:** 

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			NEROS	

Defendant

Angela Scott

ANGELA SCOTT

Assistant United States Attorney

ETHAN SKAGGS

Attorney for Defendant

Date: 2 20/1

Date: 2 20/18